

BEFORE THE FEDERAL ELECTION COMMISSION

COMMISSION
SECRETARIAT

In the Matter of

MUR 5453 2004 DEC 16 P 3:47

BankNorth/Arthur A. Watson & Company, Inc.

SENSITIVE

GENERAL COUNSEL'S REPORT #4

I. ACTIONS RECOMMENDED

Accept the attached conciliation agreement from Arthur A. Watson & Company,

Inc., and close the file as to BankNorth/Arthur A. Watson & Company, Inc.

II. BACKGROUNDOn September 24, 2004, following receipt of a *sua sponte* submission from

BankNorth/Arthur A. Watson & Company, Inc. ("respondent"), the Commission found,

among other things, reason to believe that respondent knowingly and willfully violated

2 U.S.C. §§ 441b(a) and 441f. In April of 2000, Arthur A. Watson & Company, Inc.

("Watson Group") made prohibited corporate contributions to the Giordano for U.S. Senate

Committee ("the Committee") by using corporate treasury funds to reimburse four

employees' and their spouses' contributions to the Committee, and disguising the

reimbursements as commissions or salaries in the total amount of \$8,000.

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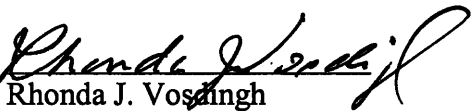
Accordingly, this Office recommends that the Commission accept the attached signed conciliation agreement from Arthur A. Watson & Company, Inc., and close the file as to BankNorth/Arthur A. Watson & Company, Inc.


IV. RECOMMENDATIONS

1. Accept the attached signed conciliation agreement submitted by Arthur A. Watson & Company, Inc.
2. Approve the appropriate letters.
3. Close the file as to BankNorth/Arthur A. Watson & Company, Inc.

Lawrence H. Norton
General Counsel

12/16/04
Date

BY: 
Rhonda J. Vossingh
Associate General Counsel for Enforcement


Sidney Rocke
Assistant General Counsel


Christine C. Gallagher
Attorney

Attachments:

1. Signed conciliation agreement
2. Copy of civil penalty check

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